

# ENFORCEMENT SENSITIVE

Mapco-  
yr

1. have all 3008(a) requirements been met?
2. have all 3008(h) requirements been met?  
have all regulated units been closed?  
are they clean closed?
3. are there any remaining constituents of concern?
4. is the state order adequate to address remaining issues?

3008(a)

1. \$80,000 K. penalty - total w/in 120 days from effective date
2. institute H.W. Management procedures
3. develop waste analysis plan, inspections record keeping procedures, maintain records, demonstrate financial assurance for the waste storage area Tank 192, applicable facility sumps & surface impoundments w/in 60 days
4. w/in 90 days submit a schedule for pre closure investigation & submitting closure plans for above mentioned units  
for the surface impoundment the closure plans shall address g.w. monitoring & corrective action standards  
-> determine extent of contamination from ea. unit & confirm that removal, cleanup & /or decontamination has occurred

This consent order shall remain in effect until EPA has determined that MAPI has satisfactorily performed the terms of this consent order or until a complete RCRA final permit for the facility is issued & effective - whichever ever occurs first

IMAGED

# ENFORCEMENT SENSITIVE

Soils near 909b - trace amounts BTEX, TPH

gw " " BTEX, acetone, methylene chloride, 1,1,1-trichloroethane  
benzene \* drinking water standard concentrations

308(h)

1 w/ 90 days of the effective date:

submit IM workplan & schedule for removal of HW. or constituents from the Surface Impoundment Tank 192, & pumps. 901, 905, 909b, & 05-7.  
implement IM workplan w/in 30 days of approval by EPA

2 perform & complete an RFI

3 if RFI determines necessary MAPEO will perform & complete a CMS

? did EPA determine a CMS is necessary

? were the closures clean or w/waste in place.

? is the remaining plume product only

? what does the state order require?